

MAINE DISTRICT COURT

DOMINGUS: NOBREGA[®]
UCC Contract # MA, S.O.C. [REDACTED]
UCC Contract # ME, S.O.C. [REDACTED]
Transmitting Utility, Estate Trade name,

Docket No.:

V.

YORK COUNTY SHERIFF,
JAIL ADMINISTRATORS,
CHAPLAIN,

Respondents, et al,

COMPLAINT, ALLEGATION
OF SEVERAL PERSONS IS
RESPONSIBLE OF CONST.
VIOLATION

COMES NOW the Transmitting Utility - Estate DOMINGUS
NOBREGA[®] Tradename Registered & Copy Righted & Bonded by an Private
Discharge Indemnity Bond & Private Set Off Bond, with all said name/
NAME with the (UCC Contracted) with the Secretary of Treasury Steven T.
Mnuchin, by a Private (Exempt From Levy) Discharge Indemnity Bond #
430100198 - Issued 11/12/2019 & a Private Set Off Bond # 430100184 - Issued
11/08/19, the maturity on both Bonds is 11/27/2088 in the Value of
\$50,000,000.00 for any Levies, Charges, Cases, True Bills, Taxes, Fines,
Fees, Judgments, Bail, Presentments etc & is Exempt From Levy from
courts at this time, (Any use of Trade name, Trademark or Copy Righted property is
hereby UnAuthorized) with his only Authorized Rep., the Copy Righted, Bonded &
Registered Executor of Estate, Sir, domingus: nobrega[®] UCC-1-308 hereby now
Presents/ Submits this motion, COMPLAINT, ALLEGATION OF
SEVERAL PERSONS IS RESPONSIBLE OF CONST. VIOLATIONS.

COMPLAINT

THE TRANSMITTING UTILITY ALLEGES:

Ground 1 ::

On or about May 17th 2020 Respondents, York County Sheriff, York County Jail Administrator's or Chaplain has denied NOBREGA his U.S. Constitutional Right of the 1st Amendment - Freedom to Practice his Jewish Religion, along with the Maine Constitution Section 1: Natural Rights; & Section 3: Religious freedom; Sects equal; Religious tests Prohibited; Religious teachers, While being held at the York County Jail to undersigned date herein.

1.: On or about May 17th 2020 NOBREGA had turned his Person into Jail with all his Jewish Religious Prayer items for Prayer every day - Tzitzit, 2 Tallit, Tefillin, Siddur, To Freely Practice his Jewish Pray while being held at the York County Jail.

2.: On or about May 17th 2020 NOBREGA had all his Jewish Religious Pray items with him until a SGT & two other Jail deputies Threaten, disessed & violently Coerced NOBREGA to give them all his Jewish Prayer items for daily Prayer.

3.: On or about May 17th 2020 NOBREGA had explained to the Three Jail deputies he has to have all the Jewish items to Freely Practice his Jewish Religion, & it is his Constitutional Right to keep his Jewish Religion Prayer and items.

4. SEC 3, Maine Constitution - All individuals have a natural & unalienable right to worship Almighty G-d according to the dictates of their own (Jewish-Sephardic Prayer) Consciences, & no person shall hurt, molested or restrained in that person's liberty or estate for worshipping G-d in the manner & season most agreeable to the dictates of that person's own Conscience, nor for that person's religious professions or sentiments, provided that that person does not disturb the public peace, nor obstruct others in their religious worship; -- & all persons demeaning themselves peaceably, as good members of the State, shall be equally under the protection of the laws, & no subordination nor preference of any one sect or denomination to another shall ever be established by law, nor shall any religious test be required as a qualification for any office or trust, under this State; & all religious societies in this State, whether incorporate or unincorporate, shall at all times have the exclusive rights of electing their public teachers, & contracting with them for their support & maintenance.

Due to the above Stated Maine Constitutional Right, the Jail Administration, Chaplain & Sheriff has (May 16th on) violated NOBREGA's above Right, when the Jail Staff took by force all NOBREGA's Jewish Religious Ritual Prayer items needed to pray with by Jewish Laws of Prayer daily, Mandatory items to conduct the Prayer with (Siddur, Tzitzit, Tallit, Tefillin) when conducting Shaharit (Morning Prayer), Mincha (Afternoon Prayer), Maariv (Evening Prayer) & Shabbat (Friday eve & Saturday Morning & Evening Prayer)

5.: The York County Jail or the Chaplain's Office has NO Jewish Prayer Items Such as Siddurs, Tzitzit, Tallit, Tefillin, to loan to a Prisoner when held in Jail. Nor do they have a Set Program for a Jewish Prisoner to Obtain the Prayer items needed for daily Prayer, whether the items are brought from Prisoners home or to buy new items at a lower Cost. Not a 30% Mark up.

6.: The York County Jail Administrators, Chaplain & Sheriff has denied NOBREGA's Jewish Prayer items needed for daily Prayer that is sitting in NOBREGA's Jail Personal Property bag in Book since May 16th 2020. Items the Rabbi (NOBREGA's Rabbi) had Spoke to the Chaplain about NOBREGA's needing for daily prayer. When the Rabbi came to the York County Jail to visit NOBREGA upon request of NOBREGA in June 2020. This is a Constitutional violation.

7.: The York County Jail Administrators, Chaplain & Sheriff has denied to Provide NOBREGA with Shabbat Ritual Matzos, Grape Juice & 2 Candles for Friday evening, Saturday morning & Saturday evening, for the Jewish high holiday of Shabbat every Friday evening & Saturday, since May 16th 2020 to today, this violates NOBREGA's Constitutional Rights

8.: The York County Jail Staff did forcefully take off NOBREGA's Body his Tzitzit on May 19th 2020 at 0830 to 0930 hrs in Booking. NOBREGA told Jail Staff his Religious needs

& Rights, Jail Staff did knowingly & Willingly violate NOBREGA⁶⁸ when 3 officers did Physically Threaten NOBREGA by force and bodily harm if he did not give up his Jewish Religious item. The Jewish Tzitzit is a Covering that has to be worn every day all day as a Order from G-d (Hashem) in the Torah-Jewish laws 325-331 Talmud. Upon Threat of harm NOBREGA⁶⁸ removed his Religious Coverings, Jail Staff then discriminated the Jewish laws pulled up the Covering and threw it in the Property bag. Then Jail Staff brought Orange Clothes & yellow and instructed/ordered NOBREGA⁶⁸ to put it on, NOBREGA⁶⁸ requested his Tzitzit back and was denied, NOBREGA⁶⁸ was then Cuffed & leg Shackled and walked to C1 unit butt Naked due to the denial of the return of NOBREGA⁶⁸'s Jewish Religious Prayer items & Constitutional Right. (See video of Booking & hall way going to C1 on May 19th Tuesday 2020 at around 0800 hrs to 0930 hrs) (Forced to Walk Naked)

Ground 2.:

On or about May 17th 2020 the York County Administration & Chaplain was informed that NOBREGA⁶⁸ is Jewish and only eats Kosher NO Beef meals, & that NOBREGA is a Pescatarian - who eats Chicken. Since the Delivery of NOBREGA⁶⁸ to the York County Jail the Staff has been feeding Beef Kosher meals every Meal Tray except Breakfast. NOBREGA⁶⁸ has lost a lot of Weight due to this abuse and negligence of Care while discriminating NOBREGA⁶⁸'s Jewish belief and Needs.

1.: NOBREGA^{CS} has filed Grievance Forms on this issue 6/15/2020, So did 9 other Prisoners on NOBREGA^{CS}'s behalf, due to they (Witnesses) watched NOBREGA^{CS} be put through his pain & Suffering, due to the Jail Staff's negligence and lack of Care of NOBREGA^{CS}'s Religious needs and or Rights by the Constitution.

2.: York County unit Officers did log notations in the York County Jail Computer NOBREGA^{CS} refused Meal Trays due to Kitchen Sent Beef Trays & NOBREGA^{CS} does not eat Beef. Reports filed by Staff at around May 17th 2020 to today. Religiously NOBREGA^{CS} does not eat Beef as a Sephardic Jewish Man. This is discrimination of Religious Practices.

3.: York County Jail Kitchen is an unKosher kept Kitchen with unKosher Food preps for Kosher meals and a Certified Kosher area to prep or Cook Kosher meals. York County Jail Kitchen is an unKosher Kitchen with unKosher employee- who don't know how to keep Jewish Kosher laws while prepping or Cooking Kosher meal Trays. This is a Religious violation too.

4.: York County Jail Commissary has very little Kosher Food items on it for Jewish men to buy and make Kosher meals. The main items that are Kosher is Cakes or Candy, very little Cookable Food items. Most of the York County Commissary listed items are for people who don't Keep a Religious Kosher diet. This is a Constitutional violation too.

CONCLUSION

WHEREBY the Transmitting Utility DOMINGUS NOBREGA^{CB}_{ucc-3-603(b)} hereby States his Conclusion to his Complaint. This Constitutional Violation Complaint should hereby now be Accepted & Granted by this Court for Hearing & Judgment. All witnesses in Witness list will testify to the facts presented herein this Complaint today.
Thank You

VERIFICATION

WHEREBY the Transmitting Utility DOMINGUS NOBREGA^{CB}_{ucc-3-603(b)} hereby gives Verification of the above Stated Complaint, that the above Stated is Facts & is True & Correct by the best of his knowledge & is held under Maine Statute of Penalty of Perjury & Title 28 usc § 1746.

DOMINGUS NOBREGA^{CB}_{ucc-3-603(b)}
Signature of Transmitting Utility

Dated: June 28 2020

Respectfully Submitted

DOMINGUS NOBREGA^{CB}_{ucc-3-603(b)}
Signature of Transmitting Utility

WITNESS LIST - June 28th 2020

Witness list of People who Watched the Jail Administration, Chaplain & Sheriff violate NOBREGA's Jewish Religious Rights as outlined in Complaint and Affidavit attached to this list, Denial of Religious Prayer Items & Knowing NOBREGA does not eat Beef, Jail only feeding NOBREGA Beef trays. (One tray a week wouldn't be Beef).

1. RAFAEL ABREV # 646-703-3262 341, 44st Brooklyn, NY, 11220

2. Shawn Johnson 860-874-6416 28 Pearl St Lewiston Maine 04002

3. Pappilion Mals 603-578-7678 15 Johnson St Belmont, NH, 03220

4. Allen Bowman - 1207-608-1813, 37 Pleasant St Springvale ME 04973

5. Adam Delano, (Maine State Prison 64439 MDOC)

9. Connor J McGlone
40 Ridge Road
Ossipee NH 03814

6. Justin Drew - 207-604-3775,

603-539-1049

7. Jediah D Watson (State of Maine Inmate Advocate)
3 Highway drive Poland ME 207998-3422

8. Charles Curry - 219-323-1934

727 Moor Rd.
North Chicago, IL 60064

8 of 8.

Exhibit List

1. Ex A, York County Jail Inmate Grievance Form
Dated, 6.12.2020
No Action given to NOBRGA[®] or Religious Prayer items

2. Ex B, York County Jail Inmate Grievance Form
Dated, 6, 20, 2020
Not answered, - They have 5 business days to
answer, by Program Statement of Jail.

3. Ex C, York County Jail Inmate Grievance Form
Dated, 6, 12, 2020
Not answered - They have 5 business days to
Answer by Program Statement of Jail.

LOG # 5869 ^{Exhibit} A B3 2112
YORK COUNTY JAIL
INMATE GRIEVANCE FORM

ADMIN
Shift Supervisor Initials and Date
KLM 6/12/2020

I, The State of NOBREGA ^{UCC# 2020021010790049-27} DOB: / / 76 submit this grievance for consideration by the York County Jail Administration. I understand that I will not be subjected to any kind of punishment or pressure by the staff of the Jail for submitting this. The following description is a true statement of the facts, to the best of my knowledge.

SIGNED: ^{Estate Name!} UCC Contract # ME, S.O.C. 2020021010790049, DATE: / / UNIT CP

STATEMENT OF GRIEVANCE BY INMATE: ^{Jewish} Religious 1st Amendment violation, denied religious items
I am being forced to file this grievance due to the admin's failure to see my religious needs met. I have exhausted all other remedies. I have sent requests and spoken with the chaplain and was told that all of my religious items would be allowed back to me. I never should have been denied them and was supposed to receive them back out of my property by now. This intentional dragging of the proverbial foot is tantamount to "Retaliation" and violation of Human, Civil, Jewish and Religious Rights as well as Rule. My items need to be returned. This is not acceptable. ^{please stop violating me and my god/religion}

RECEIVED BY: John B. [Signature] DATE: 6/15/2020
(Officer's Name (Please Print))

TO BE COMPLETED BY THE INVESTIGATOR WITHIN TEN (10) WORKING DAYS AND PROCESSED BY THE ADMINISTRATION WITHIN THIRTY (30) DAYS. 0036

RESULTS OF GRIEVANCE INVESTIGATION:

MR. NOBREGA - I have been in contact w/ Pastor Boyd about your TALL and other items. He is meeting with a Rabbi about the items and when that is complete he will either approve them or not after that time. With restrictions in place he has had a difficult time arranging a time.

INVESTIGATOR: [Signature] DATE: 6/15/2020
(Signature)
ADMINISTRATION: [Signature] VITIELLO DATE: 6/19/2020
(Signature) (Print)

Nothing was ever provided to NOBREGA

TO THE INMATE:

The information presented above describes the response to your grievance by the York County Jail Administration. You have the right to appeal this decision to the Jail Superintendent within three (3) days after you receive this document. If you wish to appeal, you must request a Grievance Appeal Form (F-160A).

LOG # 5880 Exhibit B YORK COUNTY JAIL
INMATE GRIEVANCE FORM

Shift Supervisor Initials and Date

BDF 02/20/2020

I, Domíngos Nóbrega DOB: 11/07/1970 submit this grievance for consideration by the York County Jail Administration. I understand that I will not be subjected to any kind of punishment or pressure by the staff of the Jail for submitting this. The following description is a true statement of the facts, to the best of my knowledge.

SIGNED: [Signature] DATE: 02/20/2020 UNIT B-3
Exhibit

STATEMENT OF GRIEVANCE BY INMATE:

I am writing this grievance because I was not properly informed of my rights and the procedures for filing a grievance. I was only told that I could file a grievance, but I was not given any information about how to do so. I was also not given any information about the time limit for filing a grievance. I was only told that I had to file a grievance, but I was not given any information about what to do if I was not satisfied with the results of the grievance process. I was also not given any information about the right to appeal a grievance decision. I was only told that I had to file a grievance, but I was not given any information about what to do if I was not satisfied with the results of the grievance process. I was also not given any information about the right to appeal a grievance decision. I was only told that I had to file a grievance, but I was not given any information about what to do if I was not satisfied with the results of the grievance process. I was also not given any information about the right to appeal a grievance decision.

RECEIVED BY: M. Morde DATE: 6/20/2020
Officer's Name (Please Print)

TO BE COMPLETED BY THE INVESTIGATOR WITHIN TEN (10) WORKING DAYS AND PROCESSED BY THE ADMINISTRATION WITHIN THIRTY (30) DAYS.

RESULTS OF GRIEVANCE INVESTIGATION:

[Blank lines for results of grievance investigation]

INVESTIGATOR: _____ DATE: ____/____/____
(Signature)

ADMINISTRATION: _____ DATE: ____/____/____
(Signature) (Print)

TO THE INMATE:
The information presented above describes the response to your grievance by the York County Jail Administration. You have the right to appeal this decision to the Jail Superintendent within three (3) days after you receive this document. If you wish to appeal, you must request a Grievance Appeal Form (F-160A).

Shift Supervisor Initials and Date
1210 6/1/80

SIGNED: / JAMES DATE: / / UNIT 2

[illegible]

RECEIVED BY: SA [Signature] DATE: 2/1/2010
Officer's Name (Please Print)

TO BE COMPLETED BY THE INVESTIGATOR WITHIN TEN (10) WORKING DAYS AND PROCESSED BY THE ADMINISTRATION WITHIN THIRTY (30) DAYS.

[illegible]

ADMINISTRATION: _____ / _____ DATE: ____/____/____
(Signature) (Print)

The information presented above describes the response to your grievance by the York County Jail Administration. You have the right to appeal this decision to the Jail Superintendent within three (3) days after you receive this document. If you wish to appeal, you must request a **Grievance Appeal Form (R-160A)**.

MAINE DISTRICT COURT

DOMINGUS NOBREGA⁶⁸

UCC Contract # MA, S.O.C. [REDACTED]

UCC Contract # ME, S.O.C. [REDACTED]

Transmitting Utility, Estate,

Docket No.:

V.

YORK COUNTY SHERIFF,
JAIL ADMINISTRATORS,
CHAPLAIN,

Respondents, etal,

AFFIDAVIT FOR
COMPLAINT, ALLEGATION
OF SEVERAL PERSONS IS
RESPONSIBLE OF CONST.
VIOLATION

COMES NOW the Transmitting Utility - Estate DOMINGUS NOBREGA⁶⁸ Tradename Registered & Copy righted & Bonded by an Private Discharge Indemnity Bond & Private Set Off Bond, with all Said name/NAME with the (UCC Contracted) with the Secretary of Treasury Steven I. Mnuchin, by a Private (Exempt From Levy) Discharge Indemnity Bond # 430100198 - Issued 11/12/19 & a Private Set Off Bond # 430100184 - Issued 11/08/19, the maturity on both Bonds is 11/27/2088 in the Value of \$50,000,000.00 for any Levies, Charges, Cases, True Bills, Taxes, Fines, Fees, Judgments, Bail, Presentment etc & is Exempt From Levy from Courts at this time, (Any use of Tradename, Trademark, or Copy righted property is hereby Unauthorized) with his only Authorized Rep., the Copy righted, Bonded & Registered Executor of Estate, Sir. domingus nobrega⁶⁸ UCC1308 hereby now Presents / Submits this Affidavit, AFFIDAVIT FOR COMPLAINT, ALLEGATION OF SEVERAL PERSONS IS RESPONSIBLE OF CONST. VIOLATION.

AFFIDAVIT STATEMENT

WHEREBY the Transmitting Utility DOMINGUS NOBREGA^{CB} hereby gives a Statement of Facts by Affidavit for his Complaint to this Court, on the County Sheriff violating NOBREGA^{CB}'s Maine Constitution Rights.

1.: NOBREGA^{CB} is of Sound mind & Body to Make this Affidavit of Fact to his Complaint.

2.: NOBREGA^{CB} is of legal age to make an Affidavit of Fact, for his Complaint.

3.: NOBREGA^{CB} has finished Some College and finished high School, to file this Affidavit, for his Complaint.

4.: NOBREGA^{CB} hereby States that every Claim he Stated within COMPLAINT, ALLEGATION OF SEVERAL PERSONS IS RESPONSIBLE OF CONST. VIOLATION is True Facts.

5.: NOBREGA^{CB} hereby States that the Jail Staff, Administration did knowingly & Willingly violate his Jewish Religious Rights held under Maine Constitution & U.S. Constitution.

6.: NOBREGA^{CB} hereby States that the Jail Staff on May 19th 2020 did force him to Walk through the Jail Fully Naked in Public in hand Cuffs and Shackles. (0800 to 0930 hrs, Check Jail Video)

7.: NOBREGA^{CR} hereby States that the Jail Staff on May 17th 2020 did Start taking his Jewish Religious Prayer items he needs for daily Prayer from him and Placed it in a personal Property bag in Booking and Refuses/denies to give it back to him for Prayer today.

8.: NOBREGA^{CR} hereby States that he did file Multiple Grievances On his Religious issues and the Jail Administration & Chaplain (May 17th to Today) refuse to answer them or provide NOBREGA^{CR} his Jewish Religious Prayer items So he can pray by Jewish law Set by G-d or Provide Grape Juice, Matzos & 2 Candles for Shabbat Friday evening Services & Saturday Morning Services & Havdala Service, Which is every Friday & Saturday.

9.: NOBREGA^{CR} hereby States that he knows 2 Rabbis had Personally Spoke to the Jail Chaplain in the Beginning of June and told the Chaplain has to have all the Prayer items listed in the Complaint this Affidavit is for. One of the Rabbi's did Come to visit NOBREGA^{CR} at the Jail for an hour & half (it was NOBREGA^{CR} Rabbi on the Street) and then went directly to the Jail Chaplain and told him NOBREGA needed his Jewish Prayer item for daily Prayer by Jewish law. Chaplain is still denying to give NOBREGA his Prayer items to this day.

10. ∴ NOBREGA^{CC} hereby States that the Chaplain & or the Jail Administrators had never bought any type of Jewish Prayer items for a Jewish Prisoner to borrow while being held in the York County Jail, NO Siddurs, Tzitzit, Tallit, Tefillin, Kippurs, nor is there a Program for a Jewish Prisoner to obtain the items. Along with a very limited Food Selection on the Commissary for a Jewish Prisoner to buy if he is following dietary Kasher laws to eat.

CONCLUSION

WHEREBY the Transmitting Utility DOMINGUS NOBREGA^{CC} (UCC 3-603(b)) hereby gives a Conclusion to this Affidavit, this Affidavit is to the COMPLAINT and to AFFIRM the Claims (All) in the COMPLAINT this AFFIDAVIT is attached to. (See Exhibits A, B, C Jail Filed Grievances) By this AFFIRMATION OF AFFIDAVIT & Witnesses willing to testify on the Attached Witness list, this AFFIDAVIT & COMPLAINT Should hereby be Accepted.

VERIFICATION

WHEREBY the Transmitting Utility DOMINGUS NOBREGA^{CC} (UCC 3-603(b)) hereby States a Verification to this AFFIDAVIT, that it is True & Correct to the best of his knowledge held under the Pains of Penalty of Perjury of the State of Maine Statute & Title 28 USC § 1746.

Dated: June 28 2020

DOMINGUS NOBREGA^{CC} (UCC 3-603(b))
Signature of Transmitting Utility

Submitted by

Dated: June 28 2020

DOMINGUS NOBREGA^{GB}

Signature of Estate
UCC Contract # ME S.O.C. [REDACTED]

CERTIFICATE OF SERVICE

Whereby the Transmitting Utility hereby give Certificate of Service to the Clerk of Court, due Service has been Served by Regular Mail, postage pre paid to the Clerk at 45 Kennebunk Rd Alfred ME 04002, due to the hostage/kidnapping Status the Estate is indigent and request all Respondents Served.

DOMINGUS NOBREGA^{GB} Dec 3-603(b)